

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

AUBREY FOXWORTHY,

[DOB: 10/06/1943]

Defendant.

No. 2:25-cr-04021-SRB

COUNT 1

18 U.S.C. § 922(a)(1)(A)

Dealing Firearms Without a License

18 U.S.C. § 922(a)(1)(A)

NMT 5 Years' Imprisonment

NMT \$250,000 Fine

NMT 3 Years' Supervised Release

Class D Felony

COUNT 2

26 U.S.C. § 5861(d)

Possession of Unregistered Firearm

NMT 10 Years' Imprisonment

NMT \$10,000.00 Fine

NMT 3 Years' Supervised Release

Class C Felony

FORFEITURE ALLEGATION

18 U.S.C. § 924(d)

\$100 Special Assessment (Each Count)

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

(Dealing in Firearms Without a License)

18 U.S.C. § 922(a)(1)(A)

From an unknown date but at least as early as on or about June 2, 2023 through at least on or about September 9, 2024, in Moniteau and Morgan Counties, in the Western District of Missouri, and elsewhere, the defendant, **AUBREY FOXWORTHY**, not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections

922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT 2
(Possession of Unregistered Firearm)
26 U.S.C. § 5861(d)

On or about September 9, 2024, in Moniteau County, in the Western District of Missouri, the defendant, **AUBREY FOXWORTHY**, knowingly possessed a firearm, namely, a rifle with a barrel length of less than 16 inches, which is a firearm as defined pursuant to 26 U.S.C. § 5845(a), which was not registered to him in the National Firearms Registration and Transfer Record; all in violation of Title 26, United States Code, Sections 5841, 5861(d) and 5871.

FORFEITURE ALLEGATION

As a result of the offenses alleged in this Indictment, and pursuant to Federal Rule of Criminal Procedure 32.1 and Title 18, United States Code, Section 924(d)(1), the defendant, **AUBREY FOXWORTHY**, shall forfeit any firearm and ammunition involved in or used in the violation.

Substitute Assets

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p) as

incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of forfeitable property.

The property subject to forfeiture includes, but is not limited to, the property listed in Attachment A to this Indictment.

A TRUE BILL.

/s/ Signature on file USAO

FOREPERSON OF THE GRAND JURY

Aaron M. Maness

Aaron M. Maness

Assistant United States Attorney

Missouri Bar No. 63666

Dated: 04/08/2025